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September 22, 2006

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

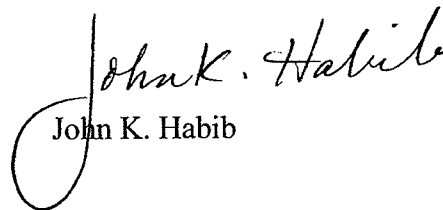
Re: Commonwealth Electric Company, D.T.E. 06-19

Dear Ms. Cottrell:

Please find attached on behalf of Commonwealth Electric Company, d/b/a NSTAR Electric (the "Company") responses to information requests asked by the Department of Telecommunications and Energy, as listed on the following page. The Company seeks an extension until October 6, 2006, to file its response to information request DTE-3-1 in order to provide the Company with additional time to compile the substantial amount of information sought by the Department in that request.

Thank you for your attention to this matter. Please contact me if you have any questions about the filing.

Very truly yours,


John K. Habib

Enclosures

cc: John Keene, Hearing Officer
Joseph Rogers, Assistant Attorney General
Ron LeComte, Director, Electric Power Division
Kevin Brannelly, Director, Rates and Revenue Requirements Division

INFORMATION REQUEST RESPONSES ATTACHED

DTE-3-2

DTE-3-3

DTE-3-4

Information Request DTE-3-2

In the current Annual Service Quality Plan Performance Report, Section 2.II.A.1 the Company states: "... The deadband for this measure for each NSTAR Electric and NSTAR Gas company will be calculated by determining the standard deviation associated with the Company's 5-year historical performance for this measure and applying it to the benchmark of 80 percent of calls answered within 30 seconds." Please identify if the "5 year historical performance" was reflected in the DTE 05-85 Settlement, and provide appropriate cite(s). If not, explain the company's rational for selecting this period.

Response

Paragraph 2.29 of the Settlement Agreement approved by the Department in D.T.E. 05-85 establishes for NSTAR Electric a performance benchmark for call answering of 80 percent of calls answered within 30 seconds including abandoned calls. The Settlement Agreement does not change the manner by which penalties and offset credits are to be computed under the Department's Guidelines. Accordingly, the Annual Service Quality Plan continues to measure offsets and penalties consistent with the Department's D.T.E. 99-84 Guidelines, *i.e.*, by taking the Company's historical performance for the measure and calculating a standard deviation from this historical performance to create a deadband for penalty/offset calculation. The only difference is that the Company is applying the standard deviation based on historical performance to a static benchmark of 80 percent of calls answered within 30 seconds including abandoned calls, rather than a moving benchmark from year-to-year.

The five-year historical performance period was chosen because, prior to 2001, Boston Edison Company does not have historical data measuring call answering performance within a 30-second timeframe. Prior to that year, the Company measured call answering performance only within a 20 second timeframe. Moreover, the Department has recognized that, when computing a standard deviation for purposes of penalty/offset calculation, at least three years of historical data is necessary to provide a statistically significant sample sufficient to determine a reliable deadband. D.T.E. 99-84 Guidelines at Section I.C. Accordingly, the available five-year historical performance period for calculating a standard deviation for this measure is appropriate to determine a penalty/offset deadband for NSTAR Electric's call answering measure.

Information Request DTE-3-3

On Schedule 1, page 1 of 2, the Company identified that 2005 performance observation for “% Calls Answered” was 79.14. Footnote 2 on that page states this statistic is based on “calls handled within 30 seconds, includes abandoned calls.” On Schedule 1, page 2 of 2, the Company provides the 1997 through 2004 yearly statistics for this measure. Footnote 2 on this page again identifies that these statistics are based on “calls handled within 30 seconds, includes abandoned calls.” Please confirm that each footnote is accurate. If the footnote is not accurate then identify for each year (1997 through 2005) what these individual yearly statistics for this measure would be if based on calls handled within 30 seconds, including abandoned calls.

Response

The footnotes are accurate. Cambridge Electric Light Company and Commonwealth Electric Company have measured their call answering performance as “calls answered within 30 seconds, including abandoned calls, includes calls abandoned after threshold” since 1997. The incorporation of abandoned calls into the statistic was accomplished by dividing: (1) the total calls answered within 30 seconds (not including abandoned calls); by (2) total calls offered, less abandoned calls at 30 seconds. This formula is different that used by Boston Edison Company, which incorporated abandoned calls into its statistic by dividing: (1) the total calls answered within 20 seconds (not including abandoned calls); by (2) total calls offered, including abandoned calls.

Commonwealth Electric Company’s historical data for this measure is provided in Schedule 1 of its ASQR. Please note, however, that for purposes of calculating a standard deviation to be applied to the new NSTAR Electric Telephone Service Factor benchmark of “80 percent of calls answered within 30 seconds, including abandoned calls,” per the D.T.E. 05-85 Settlement, the Company calculated 5 years of historical data by dividing: (1) the total calls answered within 30 seconds, plus abandoned calls within 30 seconds; by (2) the total calls offered, including abandoned calls. Accordingly, this formula incorporates a numerator and denominator that are more consistent with each other and is consistent with the Settlement measure, which requires the incorporation of abandoned calls into the calculation. This five year history, from 2001 through 2005 is provided in Appendix 12 in each of NSTAR Electric’s ASQR filings.

Information Request DTE-3-4

Please provide an updated Appendix 12 with 10 years of Percent Calls Answered, where the statistics reflect calls handled within 30 seconds, including abandoned calls.

Response

Please refer to the Company's response to Information Request DTE-3-3.